

N THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
DOMINIC TRUELOVE	:	VIOLATIONS:
COREY STALEY	:	18 U.S.C. § 2113(d)
ABDULLAH AL-TAYEH	:	(armed bank robbery
	:	6 counts)
	:	18 U.S.C. § 2
	:	(aiding and abetting
	:	6 counts)
	:	Notice of Additional Factors

INDICTMENT

COUNT 1

THE GRAND JURY CHARGES THAT: ____

On or about July 26, 2004, in Lansdale, in the Eastern District of Pennsylvania,
defendants

Dominic Truelove and

Abdullah Al-Tayeh,

knowingly and unlawfully, by force and violence, and by intimidation, did take, and aid and abet
the taking, from employees of the Fleet Bank, 890 South Valley Forge Road, Lansdale,
Pennsylvania [Fleet Bank] lawful currency of the United States, that is, approximately \$7,708,
belonging to, and in the care, custody, control, management and possession of the Fleet Bank, the
deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing,

defendants **Truelove** and **Al-Tayeh** did knowingly and unlawfully assault and put in jeopardy, and aided and abetted the assault and placement in jeopardy of, the lives of the employees of Fleet Bank, and other persons, by use of a dangerous weapon, that is, an pellet gun.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 6, 2004, in North Brunswick, in the District of New Jersey
defendants

Dominic Truelove and

Abdullah Al-Tayeh,

knowingly and unlawfully, by force and violence, and by intimidation, did take, and aid and abet the taking, from employees of the Synergy Bank, 1727 Route 130, North Brunswick, New Jersey [Synergy Bank] lawful currency of the United States, that is, approximately \$7852, belonging to, and in the care, custody, control, management and possession of the Synergy Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendants **Truelove** and **Al-Tayeh** did knowingly and unlawfully assault and put in jeopardy, and aided and abetted the assault and placement in jeopardy of, the lives of the employees of Synergy Bank, and other persons, by use of a dangerous weapon, that is, an pellet gun, which was purchased in the Eastern District of Pennsylvania for use in this offense.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 31, 2004, in Riegelsville, in the Eastern District of Pennsylvania defendants

Dominic Truelove

Corey Staley and

Abdullah Al-Tayeh,

knowingly and unlawfully, by force and violence, and by intimidation, did attempt to take, and aid and abet the attempted taking, from employees of the First Savings Bank of Perkaise, 1315 Easton Road, Riegelsville, Pennsylvania [First Savings Bank of Perkaise], lawful currency of the United States, belonging to, and in the care, custody, control, management and possession of the First Savings Bank of Perkaise, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendants **Truelove**, **Staley** and **Al-Tayeh** did knowingly and unlawfully attempt to assault and put in jeopardy, and aided and abetted the attempted assault and placement in jeopardy of, the lives of the employees of First Savings Bank of Perkaise, and other persons, by use of a dangerous weapon, that is, an pellet gun.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 1, 2004, in Maple Glen, in the Eastern District of
Pennsylvania defendants

Dominic Truelove

Corey Staley and

Abdullah Al-Tayeh,

knowingly and unlawfully, by force and violence, and by intimidation, did attempt to take, and aid and abet the attempted taking, from employees of the Citizens Bank, 874 Welsh Road, Maple Glen, Pennsylvania [Citizens Bank], lawful currency of the United States, belonging to, and in the care, custody, control, management and possession of the Citizens Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendants **Truelove, Staley** and **Al-Tayeh** did knowingly and unlawfully attempt to assault and put in jeopardy, and aided and abetted the attempted assault and placement in jeopardy of, the lives of the employees of Citizens Bank, and other persons, by use of a dangerous weapon, that is, an pellet gun.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 1, 2004, in North Brunswick, in the District of New Jersey defendants

Dominic Truelove

Corey Staley and

Abdullah Al-Tayeh,

knowingly and unlawfully, by force and violence, and by intimidation, did take, and aid and abet the taking, from employees of the Synergy Bank, 1727 Route 130, North Brunswick, New Jersey [Synergy Bank] lawful currency of the United States, that is, approximately \$29,000, belonging to, and in the care, custody, control, management and possession of the Synergy Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendants **Truelove, Staley and Al-Tayeh** did knowingly and unlawfully assault and put in jeopardy, and aided and abetted the assault and placement in jeopardy of, the lives of the employees of Synergy Bank, and other persons, by use of a dangerous weapon, that is, an pellet gun, which was purchased in the Eastern District of Pennsylvania for use in this offense.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 23, 2004, in Maple Glen, in the Eastern District of Pennsylvania defendants

Dominic Truelove

Corey Staley and

Abdullah Al-Tayeh,

knowingly and unlawfully, by force and violence, and by intimidation, did take, and aid and abet the taking, from employees of the Citizens Bank, 874 Welsh Road, Maple Glen, Pennsylvania [Citizens Bank], lawful currency of the United States, that is, approximately \$18,683, belonging to, and in the care, custody, control, management and possession of the Citizens Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendants **Truelove, Staley and Al-Tayeh** did knowingly and unlawfully assault and put in jeopardy, and aided and abetted the assault and placement in jeopardy of, the lives of the employees of Citizens Bank, and other persons, by use of a dangerous weapon, that is, an pellet gun.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offenses charged in Counts One through Six of this indictment, defendants **Truelove** and **Al-Tayeh**:

a. Committed an offense in which the property of a financial institution was taken, and in which the taking of the property was an object of the offense, as described in U.S.S.G. § 2B3.1(b)(1); and

b. Committed an offense in which a dangerous weapon was brandished or possessed as described in U.S.S.G. § 2B3.1(b)(2)(E).

2. In committing the offenses charged in Counts Five and Six of this indictment, defendants **Truelove** and **Al-Tayeh**:

a. Committed an offense where the loss exceeded \$10,000 as described in U.S.S.G. § 2B3.1(b)(7).

2. In committing the offenses charged in Counts Two and Six of this indictment, defendants **Truelove** and **Al-Tayeh**:

a. Committed an offense where the defendants used or attempted to use a person less than eighteen years of age to commit the offense or assist in avoiding detection of, or apprehension for, the offense, as described in U.S.S.G. § 3B1.4.

2. In committing the offenses charged in Counts Three through Six of this indictment, defendant **Staley**:

a. Committed an offense in which the property of a financial institution was taken, and in which the taking of the property was an object of the offense, as described in U.S.S.G. §

2B3.1(b)(1); and

b. Committed an offense in which a dangerous weapon was brandished or possessed as described in U.S.S.G. § 2B3.1(b)(2)(E).

2. In committing the offenses charged in Counts Five and Six of this indictment, defendant **Staley**:

a. Committed an offense where the loss exceeded \$10,000 as described in U.S.S.G. § 2B3.1(b)(7).

3. In committing the offenses charged in Count Six of this indictment, defendant **Staley**:

a. Committed an offense where the defendant used or attempted to use a person less than eighteen years of age to commit the offense or assist in avoiding detection of, or apprehension for, the offense, as described in U.S.S.G. § 3B1.4.

4. In committing the August 6, 2004 robbery of Synergy Bank in North Brunswick, the District of New Jersey, at a time when he was less than 18 years of age, defendant **Staley** committed an offense that is relevant conduct as described in U.S.S.G. § 1B1.3.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney

